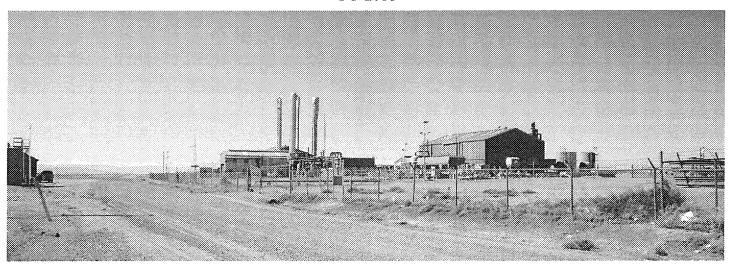


WYOMING DEPARTMENT OF ENVIRONMENTAL QUALITY

Air Quality Division Inspection Report FY-2018

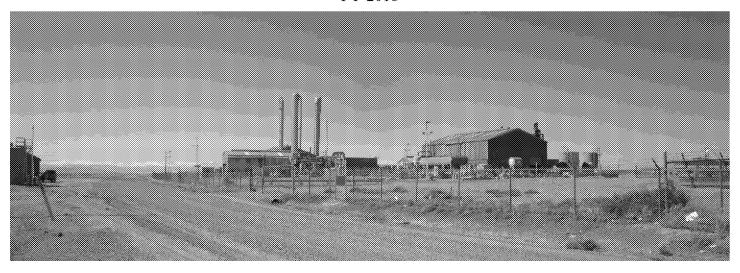


Facility Information					
Company	Green River Processing, LLC		Facility ID:	F000828	
Facility	Emigrant Trail Gas P	AFS:	5604100015		
Facility Location	41.39687/-110.08930				
Process Type	Natural Gas Liquids Processing Plant				
Facility Class	3-3-024				
Responsible Official	Michael Gebhardt Tel.: (303) 454-6679			579	
Inspection Information					
Inspection Date	4/26/2018 Previous Inspection Date: 8/9/2017				
Report Date	5/7/2018				
Company Representative(s)	Mitch Radakovich				
	Name	Title	Initial	Date	
WAQD Inspector	Travis Guthrie, PE	Air Quality Engineer	TEG	5/7/18	
WAQD Staff Review	Nancy Vehr	Air Quality Division Administrato	r //w//.	5-19-18	
	Lars Lone			5-11-18	
	Jeff Wendt, PE	District Engineer / inw		5/9/18	
Carralliana Status	Except as noted in this report, this facility was found to be operating in compliance				
Compliance Status	with applicable Wyoming Air Quality Standards and Regulations.				

Emigrant Trail Gas Plant Report Date 5/7/2018 Page 1 of 18



Air Quality Division Inspection Report FY-2018



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Company	Green River Processing, LLC		Facility ID:	F000828	
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Company Representative(s)	Mitch Radakovich				
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WAQD Inspector	Travis Guthrie, PE	Air Quality Engineer			
	Nancy Vehr	Air Quality Division Administrator			
WAQD Staff Review	Lars Lone	Compliance Program Manager			
	Jeff Wendt, PE	District Engineer			
Compliance Status	Except as noted in this report, this facility was found to be operating in compliance				
	with applicable Wyoming Air Quality Standards and Regulations.				

Emigrant Trail Gas Plant Report Date 5/7/2018 Page 1 of 18

SUMMARY

This was a scheduled inspection of the Green River Processing, LLC's Emigrant Trail Gas Plant. Green River Processing was represented by Mitch Radakovich, Operations Supervisor, and Daniel Pring, Senior Environmental Specialist. The inspection consisted of a review of operating permit 3-3-024, plant inspection, and a file review for the period 8/9/2017 through 4/26/2018. This facility was found to be operating in compliance with applicable Wyoming Air Quality Standards and Regulations

CURRENT CONCERNS

Observation of facility equipment with the FLIR camera showed emissions coming from a flange on the heat exchanger. By e-mail dated May 1, 2018 Trevor Emerick, Environmental Specialist for Green River Processing, responded that an initial repair was attempted by tightening the flange nuts but that did not stop the leak. Green River Processing placed the flange on a delay of repair list because the system will need to be depressurized and taken out of service to replace the gasket. Green River Processing indicated the leak would be repaired as soon as possible.

INSPECTION DETAILS

I began the inspection began with a review of operating status of the gas plant. At the time of the inspection, one Solar Saturn turbine and one Cooper Bessemer engine was operating. I had reviewed available Division records prior to the inspection and found all quarterly, semi-annual, and annual reports had been submitted in a timely manner. All emission testing was also found to be complete. A review of operating permit 3-3-024 conditions was conducted. No inspection concerns were generated as a result of the records and permit review.

I began the physical inspection with the two 886-hp, Solar Saturn turbine generators. Only turbine "A" was operating at the time of the inspection. Serial numbers for both turbines were checked and found to match Division records. Turbine emissions are typically routed to a single exhaust stack equipped with a heat exchanger. When the heat exchanger is not in operation, emissions are instead routed to individual exhaust stacks located on top of the turbine building. The two Cooper Bessemer, 2115-hp, compressor engines were observed and serial numbers matched Division records. Only one of the compressor engines was operating at the time of the inspection and no visible emissions were observed.

Starting in 2016, the Emigrant Trail Gas Plant removed the Smart Ash Incinerators listed in 3-3-024. Green River Processing has contracted with a company called Safety-Kleen to recycle oiling rags. The rags are stored in plastic containers, and then the waste is collected periodically and hauled away by Safety-Kleen for recycling.

Emigrant Trail Gas Plant Report Date 5/7/2018 Page 2 of 18 I then viewed the 4.5 MMBtu/hr Regeneration Gas Heater and noted that the heater was operating with no visible emissions. All emission sources identified during the inspection matched the permitted description.

I then proceeded to scan the facility potential emission sources with the FLIR infrared camera. The scan showed emissions coming from the condensate tank pressure release valve. Operating permit 3-3-024 does not require storage tank emissions to be controlled. Mr. Radakovich said he would have the valve checked to ensure it is operating correctly. The FLIR camera also showed emissions coming from a flange on the heat exchanger. Mr. Radakovich said he would have the leak repaired as soon as possible. No other leaks were identified during the inspection.

SOURCE EMISSION POINTS

SOURCE ID#	SOURCE DESCRIPTION	SIZE	CH. 6, SEC. 2 PERMITS
01	Cooper Bessemer GMVH-10 Compressor Engine A*	2115 hp	OP-163
02	Cooper Bessemer GMVH-10 Compressor Engine B*	2115 hp	OP-163
03	Solar Saturn Turbine Generator Engine A	886 hp	OP-163
04	Solar Saturn Turbine Generator Engine B	886 hp	OP-163
05	Regeneration Gas Heater	4.54 MMBtu/hr	MD-774
08	Condensate Tank	400 bbl	MD-774
09	Condensate Tank	400 bbl	MD-774
10	Condensate Tank	400 bbl	MD-774
11	Amine Still Vent	70 MMSCFD	MD-774
None	(2) Smart Ash Model 100 Incinerators	50 lb fuel burned per hour	March 28, 1996 Waiver

^{*} Cooper Bessemer GMVH-10 Compressor Engines are two stroke lean burn engines.

PERMITTING ACTIVITY

Operating Permit 3-3-024 (10/29/2013)

Renewal Operating Permit 3-3-024 was issued 10/29/2013 and replaced Operating Permit 3-2-024. The renewal permit has a five year term and is scheduled to expire 10/29/2018.

PERMIT REVIEW (3-3-024 issued 10/29/2013)

Source-Specific Permit Conditions

(F1) VISIBLE EMISSIONS [WAQSR Ch 3, Sec 2]

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- (a) Particulate emissions from the Smart Ash incinerators shall be limited to a shade or density equal to but not greater than 20 percent opacity as determined by a qualified observer.
- (b) Visible emissions of any contaminant discharged into the atmosphere from any other single emission source shall not exhibit greater than 20 percent opacity except for one period or periods aggregating not more than six minutes in any one hour of not more than 40 percent opacity.
- Status: During the 4/26/2018 inspection, there were no visible emissions observed at the Emigrant Trail Gas Plant.
- (F2) ENGINE EMISSIONS [WAQSR Ch 6, Sec 2 Permit OP-163] NO_X emissions shall not exceed the limits specified in Table I.

TABLE I Compressor and Turbine Emission Limits						
Source	Saura Description	NO _x Emission Limits				
ID	Source Description	lb/hr	TPY			
01	Cooper Bessemer GMVH-10 Compressor Engine A	19.82	86.8			
02	Cooper Bessemer GMVH-10 Compressor Engine B	19.82	86.8			
03	Solar Saturn Turbine Generator Engine A	2.64	11.6			
04	Solar Saturn Turbine Generator Engine B	2.64	11.6			

- Status: Test reports submitted during this inspection period indicate Units 01 through 04 have demonstrated compliance with the allowable NOx limits.
- (F3) FUEL BURNING EQUIPMENT [WAQSR Ch 3, Sec 3]
 NO_X emissions from the regeneration gas heater (05) shall not exceed 0.20 lb/MMBtu heat input.
- Status: There is no monitoring required per Condition (F9) of this permit due to the limited impact on ambient standards. The unit is fired with natural gas, and is assumed that NOx emissions are within allowable limits.
- (F4) TEMPORARY ENGINE OR TURBINE REPLACEMENT [WAQSR Ch 6, Sec 3(h)(i)(l)]
 - (a) Should an engine or turbine break down or require an overhaul, the permittee may bring on site and operate a temporary replacement engine or turbine until repairs

Emigrant Trail Gas Plant Report Date 5/7/2018 Page 4 of 18

- are made. Permanent replacement of a unit must be evaluated by the Division under Ch 6, Sec 2 of WAQSR to determine appropriate permitting action and evaluate the need for additional requirements resulting from the permanent replacement.
- (b) The temporary replacement unit shall be identical or similar to the unit replaced, with emission levels at or below those of the unit replaced.
- (c) The permittee shall notify the Division in writing of such replacement within five working days, provide the date of startup of the replacement engine, and provide a statement regarding the applicability of any New Source Performance Standards (NSPS) in 40 CFR Part 60; any National Emission Standards for Hazardous Air Pollutants (NESHAPs) in 40 CFR Part 63; and Compliance Assurance Monitoring (CAM) in WAQSR Ch 7, Sec 3.
- Status: No temporary replacement engines or turbines have operated since the last inspection conducted on 8/9/2017.
- (F5) SMART ASH INCINERATOR REQUIREMENTS

[WAQSR Ch 3, Sec 2; Ch 6, Sec 2 Waivers 3/28/96, 9/4/96]

The operator of the Smart Ash units shall abide by all conditions specified in waivers 3/28/96 and 9/4/96, and 40 CFR Part 279 Used Oil Specifications, including the following.

- (a) The Smart Ash units shall comply with all state and federal requirements for a used oil burner. Only used oil meeting the specification requirements of 40 CFR Part 279 shall be burned in this units. A copy of §279.11, Used Oil Specifications, is included in Appendix A of this operating permit.
- (b) Only material specified by the manufacturer as "reported fuels" may be burned in the unit, at an average rate of 50 pounds per hour.
- (c) Particulate matter emissions shall not exceed 0.20 pounds per 100 pounds of refuse charged or 0.10 pounds per hour.
- Status: Green River Processing removed the two Smart Ash Incinerators in the beginning of 2016. Materials are now stored in sealed containers and hauled away by a company called Safety-Kleen for recycling.

Testing and Monitoring Requirements

- (F6) EMISSIONS TESTING [W.S. 35-11-110 and 40 CFR 60 Subpart GG]
 - a) The Division reserves the right to require additional testing as provided under condition G1 of this permit. Should testing be required, test methods found at 40 CFR 60, Appendix A, shall be used as follows:
 - (i) For visible emissions, Method 9 shall be used.

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- (ii) For turbines subject to the requirements of 40 CFR 60 Subpart GG, testing for NO_X and SO_2 on a ppm basis shall follow the requirements of Subpart GG, and testing on a lb/hr basis shall follow Methods 1-4, 6C and 7E.
- (iii) For other NO_X emission sources, Methods 1-4 and 7 or 7E shall be used.
- (iv) For alternative test methods, or methods used for other pollutants, the approval of the Administrator must be obtained prior to using the test method to measure emissions.
- (b) Unless otherwise specified, testing shall be conducted in accordance with WAQSR Ch 5, Sec 2(h).
- **■** Status: All testing has been performed in compliance with this permit condition.
- (F7) VISIBLE EMISSIONS MONITORING [WAQSR Ch 6, Sec 3(h)(i)(C)(I)]
 - (a) During any calendar year that a Smart Ash incinerator operates, the permittee shall conduct at least one 15-minute Method 22 observation of that incinerator, while operating, over a period of 15 minutes. If any visible emissions are observed during the 15 minute period, the permittee shall conduct a Method 9 test within 30 days or the next time incinerator operates.
 - (b) Periodic monitoring for visible emissions from the Cooper Bessemer compressor engines (01 and 02), Solar Saturn turbines (03 and 04), and the regeneration gas heater (05) shall consist of monitoring the type of fuel used to ensure natural gas is the sole fuel source for these units.

■ Status:

- (a) Beginning in 2016, the Smart Ash Incinerators were removed from the facility.
- (b) As stated in each Semi-Annual monitoring report, only natural gas is burned in the compressor engines, generator engines, and heater.
- (F8) COMPRESSOR ENGINE EMISSIONS MONITORING [WAQSR Ch 6, Sec 3(h)(i)(C)(I)]
 - (a) The permittee shall measure NO_X emissions from each Cooper Bessemer engine (01 and 02) on a quarterly basis for comparison with the emission limits specified in condition F2 of this permit.
 - (b) The permittee shall measure NOX emissions from each Solar turbine (03 and 04) at least biennially for comparison with the emission limits specified in condition F2 of this permit. If emission results from biennial performance tests are less than or equal to 75 percent of the emission limit for the unit, the frequency of subsequent performance tests may be reduced to once every four years. If the results of any subsequent performance test exceed 75 percent of the emission limit, biennial testing shall resume.

Emigrant Trail Gas Plant Report Date 5/7/2018 Page 6 of 18 (c) The permittee shall measure NO_X emissions using the Division's portable analyzer monitoring protocol, or the EPA reference methods described in condition F6. The monitoring protocol can be downloaded at http://deq.state.wy.us/aqd/operating.asp or is available from the Division upon request.

■ Status:

- (a) NOx emissions have been measured from each of the Cooper Bessemer compressor engines on a quarterly basis, with the exception of when an engine has operated less than 2 weeks (336 hours) in a quarter.
- (b) Turbine "A" NOx emissions of 1.23 lb/hr were measured on April 6, 2016. Turbine "B" NOx emissions of 1.24 lb/hr were measured on March 9, 2016. Both turbines tested below 75% of the 2.64 lb/hr emission limit. Green River Processing plans on conducting NOx emission testing in 2020.
- (c) All testing has been performed in compliance with this condition.

Recordkeeping Requirements

- (F9) TESTING AND MONITORING RECORDS [WAQSR Ch 6, Sec 3(h)(i)(C)(II)]
 - (a) For any testing or monitoring performed under conditions F6 and F8, other than Method 9 or Method 22 observations, the permittee shall record, as applicable, the following:
 - (i) The date, place, and time of sampling, measurements, or observations;
 - (ii) The date(s) analyses were performed;
 - (iii) The company or entity that performed the analyses or observations;
 - (iv) The analytical techniques or methods used;
 - (v) The results of such analyses or observations;
 - (vi) The operating conditions and parameters as they existed at the time of testing or monitoring; and
 - (vii) Any corrective actions taken.
 - (b) For any Method 9 observations required by the Division under condition F6 or F7, the permittee shall keep field records in accordance with Section 2.2 of Method 9. For any Method 22 observation required by condition F7(a), the permittee shall keep field records in accordance with Sections 11.2 and 11.5 of Method 22.
 - (c) The permittee shall retain these records on-site at the facility, for a period of at least five years from the date the records are generated.

Emigrant Trail Gas Plant Report Date 5/7/2018 Page 7 of 18 ■ Status: A review of these records revealed compliance with this condition.

Reporting Requirements

- (F10) NOTIFICATION OF TESTING & TEST REPORTS [WAQSR Ch 6, Sec 3(h)(i)(C)(III)]
 - (a) Notification of the test date for the monitoring required by condition F8 shall be provided to the Division at least 15 days prior to testing.
 - (b) The permittee shall report the results of any emissions tests performed under conditions F6 and F8 within 45 days of completing the tests. The reports shall include the information indicated in condition F9(a).
 - (d) The reports shall reference this permit condition (F10), and be submitted to the Division in accordance with condition G4.
- Status: Green River Processing, LLC has provided adequate notification of testing. Test reports have been submitted within 45 days of completion.
- (F11) MONITORING REPORTS [WAQSR Ch 6, Sec 3(h)(i)(C)(III)]
 - (a) The following shall be reported to the Division by January 31 and July 31 each year:
 - Documentation that all emissions units are firing natural gas as specified in condition F7(b); and
 - (ii) Results of any Method 22 and Method 9 observations conducted during the semi-annual period.
 - (b) All instances of deviations from the conditions of this permit must be clearly identified in each report.
 - (c) The reports shall reference this permit condition (F11), and be submitted to the Division in accordance with condition G4.
- Status: Semi-annual monitoring reports have been submitted in a timely manner.
- (F12) GREENHOUSE GAS REPORTS [W.S. 35-11-110]

The permittee shall submit to the Division a summary of any report(s) required to be submitted to the EPA under 40 CFR Part 98.

- (a) The reports shall be submitted to the Division within 60 days of submission to EPA, in a format as specified by the Division.
- (b) The reports shall be submitted in accordance with condition G4(a)(i) of this permit, to the attention of the Division's Emission Inventory Program. A copy need not be sent to the DEQ Air Quality contact.
- Status: The 2016 Annual Greenhouse Gas Report was received by the Division on April 5, 2017.

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- (F13) REPORTING EXCESS EMISSIONS & DEVIATIONS FROM PERMIT REQUIREMENTS [WAQSR Ch 6, Sec 3(h)(i)(C)(III)]
 - (a) General reporting requirements are described under the General Conditions of this permit. The Division reserves the right to require reports as provided under condition G1 of this permit.
 - (b) Emissions which exceed the limits specified in this permit and which are not reported under a different condition of this permit shall be reported annually with the emission inventory unless specifically superseded by condition G17, condition G19, or other condition(s) of this permit. The probable cause of such exceedance, the duration of the exceedance, the magnitude of the exceedance, and any corrective actions or preventative measures taken shall be included in this annual report. For sources and pollutants which are not continuously monitored, if at any time emissions exceed the limits specified in this permit by 100 percent, or if a single episode of emission limit exceedance spans a period of 24 hours or more, such exceedance shall be reported to the Division within one working day of the exceedance. (Excess emissions due to an emergency shall be reported as specified in condition G17. Excess emissions due to unavoidable equipment malfunction shall be reported as specified in condition G19.)
 - (c) Any other deviation from the conditions of this permit shall be reported to the Division in writing within 30 days of the deviation or discovery of the deviation.
- Status: Green River Processing reported one permit deviation since the last inspection pertaining to NSPS OOOO/OOOOa. During the second half of 2017, Andeavor identified 1,480 components that were missed in the initial retagging conducted in October 2016. Andeavor previously communicated the finding to the Division and reported the issue in the semi-annual OOOOa report. 1,467 of the 1,480 components identified were connectors that require only annual monitoring. The components were not identified in 2016 because the initial monitoring was conducted by the retagging contractor and was not required again until October 2017. Andeavor moved the Emigrant Trail gas plant annual monitoring cycle to July 2017 to capture any potential missed components sooner that the normal monitoring cycle of October 2017.

<u>Accidental Release Prevention Requirements</u>

- (F14) ACCIDENTAL RELEASE PREVENTION REQUIREMENTS [40 CFR Part 68]
 - (a) The permittee shall meet all requirements of 40 CFR Part 68 as they apply to the facility.
 - (b) The permittee shall submit, as part of the annual compliance certification submitted under condition C1 of this permit, a certification statement concerning the facility's compliance with all requirements of 40 CFR Part 68, including the registration and submission of a Risk Management Plan.

Emigrant Trail Gas Plant Report Date 5/7/2018 Page 9 of 18 ■ Status: A risk management plant (RMP) was reviewed and submitted to EPA in June 2009. The Emigrant Trail Gas Plant is classified as a Program Level 1 which applies to processes that would not affect the public in a worst-case release.

WAQSR CHAPTER 5, SECTION 2 NEW SOURCE PERFORMANCE STANDARDS (NSPS) AND 40 CFR 60 SUBPART GG REQUIREMENTS FOR STATIONARY GAS TURBINES

(P60-GG1) SUBPART GG REQUIREMENTS [40 CFR Part 60 Subparts A and GG; WAQSR Ch 5, Sec 2;

Division Letter May 22, 1996]

The permittee shall meet all requirements of 40 CFR Part 60 Subparts A and GG and WAQSR Ch 5 Sec 2 and as they apply to affected stationary gas turbines as specified under §60.330, including the Solar turbines (03 and 04).

(P60-GG2) MONITORING FUEL SULFUR AND NITROGEN CONTENT

[40 CFR 60 Subpart GG; WAQSR Ch 5, Sec 2(j); Division Letter May 22, 1996]

The permittee shall comply with all applicable monitoring requirements of WAQSR Ch 5 Sec 2(j) and §60.334. For sulfur content and nitrogen content the permittee shall comply with (a) OR (b), and (c), as follows:

- (a) The permittee shall determine and record the sulfur content of the fuel fired in each Solar turbine (03 and 04) according to the following custom schedule:
 - (i) Sulfur monitoring shall be conducted by monthly collection of fuel samples and analysis by gas chromatograph.
 - (ii) Should any sulfur analysis required under paragraph (a)(i) of this condition indicate non-compliance with condition P60-GG1, the permittee shall notify the Division of such exceedance, and shall conduct fuel sulfur monitoring weekly until notified otherwise by the Division.
 - (iii) The permittee shall notify the Division of any change in fuel supply, including a substantial change in fuel quality. In such cases, the permittee shall conduct fuel sulfur monitoring weekly until notified otherwise by the Division.

OR

- (b) The permittee shall demonstrate that the fuel combusted in the turbines engines meets the definition of natural gas in §60.331(u). The permittee shall use one of the following sources of information to make the required demonstration:
 - (i) The gas quality characteristics in a current, valid purchase contract, tariff sheet or transportation contract for the gaseous fuel, specifying that the maximum total sulfur content of the fuel is 20.0 grains/100 scf or less; or
 - (ii) Representative fuel sampling data which show that the sulfur content of the gaseous fuel does not exceed 20 grains/100 scf. At a minimum, the amount

Emigrant Trail Gas Plant Report Date 5/7/2018 Page 10 of 18 of fuel sampling data specified in section 2.3.1.4 or 2.3.2.4 of appendix D to 40 CFR Part 75 is required.

AND

- (c) No monitoring of fuel nitrogen content is required as long as the permittee does not claim an allowance for fuel bound nitrogen as described in §60.332(a), and as long as natural gas is the fuel fired in the turbine engine.
- Status: Green River Processing, LLC contracts Applied Technology Services to conduct the monthly gas sampling. Upon inspection, records show that the fuel is monitored monthly with the gas analysis by chromatograph.
- (P60-GG3) RECORDKEEPING [WAQSR Ch 5, Sec 2(g)(ii) and (g)(v) and Ch 6 Sec 3(h)(i)(C)(II)]
 - (a) The permittee shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of the turbine engines.
 - (b) The permittee shall keep records demonstrating that the fuel used in the turbines meets the definition of natural gas, as described in condition P60-GG2 of this permit.
 - (c) The permittee shall maintain records of all measurements, reports, and other information required by the P60 conditions of this permit in a permanent form suitable for inspection. These records shall be retained on-site at the facility for a period of at least five years from the date such records are generated. Records of the most recent demonstration that fuel meets the definition of natural gas shall be retained regardless of the date of record.
- (P60-GG4) SUBPART GG REPORTS [WAQSR Ch 6, Sec 3(h)(i)(C)(III) and 40 CFR 60 Subpart GG]
 - (a) If applicable (when utilizing the custom monitoring schedule), the permittee shall submit a written report of excess emissions (as defined in paragraph (b) of this condition) to the Administrator for every calendar quarter. All quarterly reports shall be postmarked by the 30th day following the end of each calendar quarter and shall include the following information:
 - (i) The magnitude of excess emissions, any conversion factor(s) used, the date and time of commencement and completion of each time period of excess emissions, and the process operating time during the reporting period.
 - (ii) Specific identification of each period of excess emissions that occurs during start-ups, shutdowns, and malfunctions of the turbine engine(s), the nature and cause of any malfunction (if known), and the corrective action taken or preventative measures adopted.
 - (iii) When no excess emissions have occurred, such information shall be stated in the report.
 - (b) For the purpose of reporting under this condition, for the engine(s) listed in condition P60-GG1, excess emissions are defined as any period during which the

Emigrant Trail Gas Plant Report Date 5/7/2018 Page 11 of 18

- sulfur content of the fuel being fired in any of the turbine engines exceeds 0.8 percent by weight, or when the SO_2 exhaust gas concentration from any turbine engine exceeds 0.015 percent by volume at 15 percent oxygen on a dry basis.
- (c) If applicable (when using the fuel demonstration in §60.331(u)), the permittee shall submit written documentation of any change in the information used in the demonstration required by condition P60-GG2 related to the fuel fired by the turbine engines, within 45 days of such change.
- (d) The reports shall be submitted in accordance with condition G4 of this permit.
- Status (GG3 thru GG4): Upon file review and inspection of plant records, Green River Processing has demonstrated compliance.

WAQSR CHAPTER 5, SECTION 2 NEW SOURCE PERFORMANCE STANDARDS (NSPS) AND 40 CFR 60 SUBPART JJJJ REQUIREMENTS FOR STATIONARY SPARK IGNITION INTERNAL COMBUSTION ENGINES

SUBPART JJJJ [40 CFR Part 60 Subparts A and JJJJ; WAQSR Ch 5, Sec 2]

The permittee shall meet all requirements of 40 CFR 60 Subparts A and JJJJ and WAQSR Ch 5, Sec 2, as they apply to affected stationary spark ignition (SI) internal combustion engines (ICE). (As required by condition F4(c), if an engine is replaced or reconstructed, subpart applicability will need to be reevaluated and a statement regarding applicability submitted to the Division.) For the purposes of this subpart, the date that construction commences is the date the engine is ordered by the owner or operator. An affected source is defined at §60.4230.

On June 17, 2013, the Cooper Bessemer compressor engines (01 and 02) were not subject to Subpart JJJJ according to information submitted to the Division by the permittee.

■ Status: The two (2) Cooper Bessemer reciprocating engines are not subject to Subpart JJJJ.

WAQSR CHAPTER 5, SECTION 2 NEW SOURCE PERFORMANCE STANDARDS (NSPS) AND 40 CFR 60 SUBPART OOOO REQUIREMENTS FOR CRUDE OIL AND NATURAL GAS PRODUCTION, TRANSMISSION AND DISTRIBUTION

SUBPART OOOO REQUIREMENTS [40 CFR 60 Subparts A and OOOO; and WAQSR Ch 5, Sec 2]

The permittee shall meet all applicable requirements of 40 CFR 60 Subparts A and OOOO and WAQSR Ch 5, Sec 2 as they apply to affected facilities as specified under §60.5365, 60.5421, and 60.5423.

Emigrant Trail Gas Plant Report Date 5/7/2018 Page 12 of 18 Status: Green River Processing reported one permit deviation since the last inspection pertaining to NSPS 0000/0000a. During the second half of 2017, Andeavor identified 1,480 components that were missed in the initial retagging conducted in October 2016. Andeavor previously communicated the finding to the Division and reported the issue in the semi-annual 0000a report. 1,467 of the 1,480 components identified were connectors that require only annual monitoring. The components were not identified in 2016 because the initial monitoring was conducted by the retagging contractor and was not required again until October 2017. Andeavor moved the Emigrant Trail gas plant annual monitoring cycle to July 2017 to capture any potential missed components sooner that the normal monitoring cycle of October 2017.

WAQSR CHAPTER 5, SECTION 3 NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS (NESHAPS) AND 40 CFR 63 SUBPART ZZZZ REQUIREMENTS FOR STATIONARY RECIPROCATING INTERNAL COMBUSTION ENGINES

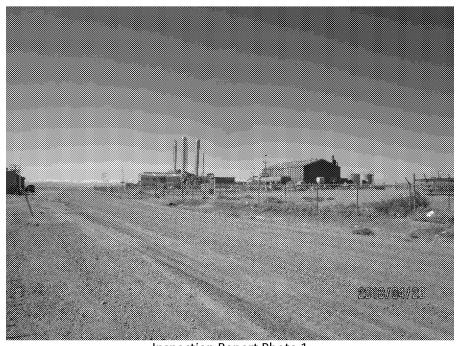
SUBPART ZZZZ REQUIREMENTS [40 CFR 63 Subparts A and ZZZZ; WAQSR Ch 5, Sec 3]

The permittee shall meet all requirements of 40 CFR 63 Subparts A and ZZZZ and WAQSR Ch 5, Sec 3 as they apply to each affected source as indicated in §63.6590(a). An affected source is any existing, new, or reconstructed stationary RICE located at a major or area source of HAP emissions, excluding stationary RICE being tested at a stationary RICE test cell/stand. (As required by condition F4(c), if an engine is replaced or reconstructed, subpart applicability will need to be re-evaluated and a statement regarding applicability submitted to the Division.) This facility is currently identified as an area source of HAP emissions. Affected sources at this facility include the Cooper Bessemer engine (01 and 02).

■ Status: The two (2) Cooper Bessemer reciprocating engines are 2-stroke lean burn engines and are not subject to Subpart ZZZZ.

Emigrant Trail Gas Plant Report Date 5/7/2018 Page 13 of 18 **SITE PHOTOGRAPHS**

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Inspection Report Photo 1 Green River Processing, LLC Emigrant Trail Gas Plant Emigrant Trail Gas Plant

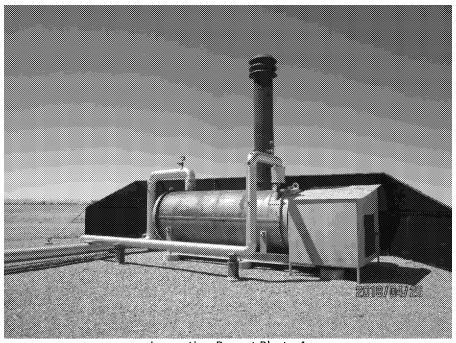


Inspection Report Photo 2 Green River Processing, LLC Emigrant Trail Gas Plant Solar Saturn Trubine "A" and "B" stacks

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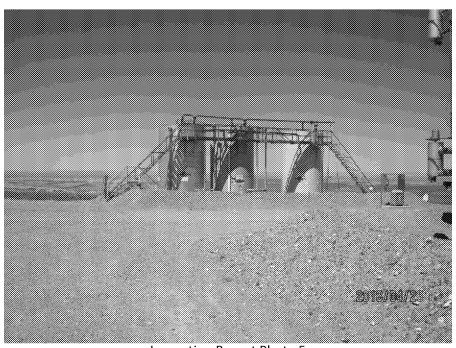


Inspection Report Photo 3 Green River Processing, LLC Emigrant Trail Gas Plant Cooper Bessemer Engine "A" and "B" stacks



Inspection Report Photo 4
Green River Processing, LLC Emigrant Trail Gas Plant
Regeneration Gas Heater

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Inspection Report Photo 5 Green River Processing, LLC Emigrant Trail Gas Plant Permitted storage tanks



Inspection Report Photo 6
Green River Processing, LLC Emigrant Trail Gas Plant
Amine Still Vent

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Inspection Report Photo 7 Green River Processing, LLC Emigrant Trail Gas Plant Heat exchanger flange fugitive emission point

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